

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

VICTORIA LOPATKA

Plaintiff,

vs.

MDL No. 2738

Case No. 3:18-CV-10729-FLW-LHG

JOHNSON AND JOHNSON, ET AL.

Defendants.

JOINT STIPULATION FOR ORDER ON THE
RELEASE OF ORIGINAL PATHOLOGY MATERIALS

Plaintiff VICTORIA LOPATKA (“Plaintiff”) and non-party the H. LEE MOFFITT CANCER CENTER AND RESEARCH INSTITUTE HOSPITAL, INC. (“Moffitt”), (collectively, the “PARTIES”) agree, stipulate, and move on the following grounds for an Order on the Release of Original Pathology Materials.

1. Plaintiff has sought to subpoena the release of pathology blocks pertaining to Victoria Lopatka.
2. Moffitt enters a limited appearance in this matter solely for the purpose of this Stipulation.
3. Moffitt’s policy concerning pathological samples requires a Court Order for release of original pathology materials.
4. Moffitt has agreed to produce the pathological materials upon execution of a Court Order.
5. Counsel for Plaintiff shall take possession of and be responsible for the pathology materials released by Moffitt.

Respectfully submitted,

Melissa Ephron

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